

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

HONX, INC.,¹

Debtor.

)
) Chapter 11
)
) Case No. 22-90035 (MI)
)
)
)

**DEBTOR'S WITNESS LIST AND EXHIBIT
LIST FOR MATTER SET FOR DECEMBER 12, 2022**

The above-captioned debtor and debtor in possession (the "Debtor") files its Witness and Exhibit List for the hearing to be held on December 12, 2022, at 9:15 a.m. (prevailing Central Time) (the "Hearing") as follows.²

Witness

The Debtor may call the following witnesses at the Hearing:³

1. Any witness listed by any other party; and
2. Rebuttal witnesses as necessary.

¹ The Debtor in this chapter 11 case, along with the last four digits of the Debtor's federal tax identification number, is HONX, Inc. (2163). The location of the Debtor's service address in this chapter 11 case is: 1501 McKinney Street, Houston, Texas, 77010.

² The Debtor reserves the right to amend this Witness and Exhibit List after reviewing any objections.

³ The Debtor reserves the right to cross-examine any witness called by any other party at the Hearing.

Exhibits

No.	Description	Mark	Offer	Object	Admit	Scaled	W/D
1.	Elroy Williams and Bassali Williams 2022 Complaint, Exhibit A to Debtor's Emergency Motion to Enforce the Automatic Stay and Motion for Entry of an Order to Appear and Show Cause as to Why Elroy Williams and Bassali Williams are Not in Contempt of the Automatic Stay [Docket No. 506-1]						
2.	Elroy Williams 2006 Complaint, Exhibit B to Debtor's Emergency Motion to Enforce the Automatic Stay and Motion for Entry of an Order to Appear and Show Cause as to Why Elroy Williams and Bassali Williams are Not in Contempt of the Automatic Stay [Docket No. 506-2]						
3.	Elroy Williams 2012 Release, Exhibit C to Debtor's Emergency Motion to Enforce the Automatic Stay and Motion for Entry of an Order to Appear and Show Cause as to Why Elroy Williams and Bassali Williams are Not in Contempt of the Automatic Stay [Docket No. 506-3]						
4.	04/29/22 Hearing Transcript, Exhibit D to Debtor's Emergency Motion to Enforce the Automatic Stay and Motion for Entry of an Order to Appear and Show Cause as to Why Elroy Williams and Bassali Williams are Not in Contempt of the Automatic Stay [Docket No. 506-4]						

No.	Description	Mark	Offer	Object	Admit	Sealed	W/D
5.	11/8/2022 Hearing Transcript, <i>In re Asbestos, Silica and Catalyst Dust Claims IV</i> , Exhibit E to Debtor's Emergency Motion to Enforce the Automatic Stay and Motion for Entry of an Order to Appear and Show Cause as to Why Elroy Williams and Bassali Williams are Not in Contempt of the Automatic Stay [Docket No. 506-5]						
	Any document or pleading filed in the above-captioned main cases.						
	Any exhibit necessary for impeachment and/or rebuttal purposes.						
	Any exhibit identified or offered by any other party.						

The Debtor reserves the right to supplement or amend this Witness and Exhibit List and to identify additional exhibits, including but not limited to rebuttal and impeachment exhibits, prior to the conclusion of the Hearing.

Houston, Texas
December 8, 2022

/s/ Veronica A. Polnick

JACKSON WALKER LLP

Matthew D. Cavanaugh (TX Bar No. 24062656)
Jennifer F. Wertz (TX Bar No. 24072822)
Veronica A. Polnick (TX Bar No. 24079148)
1401 McKinney Street, Suite 1900
Houston, TX 77010
Telephone: (713) 752-4200
Facsimile: (713) 752-4221
Email: mcavanaugh@jw.com
jwertz@jw.com
vpolnick@jw.com

*Co-Counsel to the Debtor
and Debtor in Possession*

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Christopher T. Greco, P.C. (admitted *pro hac vice*)
Matthew C. Fagen (admitted *pro hac vice*)
601 Lexington Avenue
New York, New York 10022
Telephone: (212) 446-4800
Facsimile: (212) 446-4900
Email: christopher.greco@kirkland.com
matthew.fagen@kirkland.com

- and -

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Whitney C. Fogelberg (admitted *pro hac vice*)
Jaimie Fedell (TX Bar No. 24093423) (admitted
pro hac vice)
300 North LaSalle
Chicago, Illinois 60654
Telephone: (312) 862-2000
Facsimile: (312) 862-2200
Email: whitney.fogelberg@kirkland.com
jaimie.fedell@kirkland.com

- and -

KIRKLAND & ELLIS LLP

KIRKLAND & ELLIS INTERNATIONAL LLP

Michael F. Williams, P.C. (admitted *pro hac vice*)
Daniel T. Donovan, P.C. (admitted *pro hac vice*)
1301 Pennsylvania Ave., N.W.
Washington, D.C. 20004
Telephone: (202) 389-5000
Facsimile: (202) 389-5200
Email: michael.williams@kirkland.com
daniel.donovan@kirkland.com

*Co-Counsel to the Debtor
and Debtor in Possession*

Certificate of Service

I certify that on December 8, 2022, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Veronica A. Polnick

Veronica A. Polnick